

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JADENAE TRABACCHI,

Plaintiff,
-against-

**DEFENDANTS' NOTICE
OF MOTION TO DISMISS
THE AMENDED
COMPLAINT**

THE DEPARTMENT OF EDUCATION OF THE CITY OF
NEW YORK, MELISSA AVILES-RAMOS, Chancellor,
and KATHERINE RODI, Director of Employee Relations,

No. 24 CV 6123(RPK)(TAM)

Defendants.

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint, dated December 12, 2025, the Declaration of Brigid Lynn in Support of Defendants' Motion to Dismiss the Amended Complaint, and upon all the papers and proceedings previously had herein, the undersigned will move this Court, before the Honorable Rachel P. Kovner, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza, Brooklyn, New York, 11201, on a date and time to be determined by the Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Amended Complaint in its entirety on the grounds that, as a matter of law, the Amended Complaint fails to adequately state a claim upon which relief can be granted and for any such further relief as the Court may deem just and proper.

Dated: New York, New York
December 12, 2025

MURIEL GOODE-TRUFANT
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City of New York
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By: /s/ Brigid Lynn
Brigid Lynn
Assistant Corporation Counsel

cc: All Parties of Record (By ECF)
J. Trabacchi (By email to: jadlenaetrabacchi@gmail.com)